

EXHIBIT 35

SIG SAUER P320 PISTOL REPORT

February 2025

Washington State
Criminal Justice Training Commission



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Washington State Criminal Justice Training Commission

Established in 1974, the Washington State Criminal Justice Training Commission (WSCJTC) trains law enforcement, corrections officers, and many other public safety professionals. WSCJTC's mission is to establish certification and training standards which are legally defensible and scientifically valid to ensure criminal justice professionals in Washington State have the knowledge and skills to safely protect the communities they serve.

The WSCJTC facilitates firearms training for the Basic Law Enforcement Academy (BLEA), advanced firearms certification, Law Enforcement Officers Safety Act (LEOSA) certification, Special Weapons and Tactics (SWAT) training, Patrol Tactics training as well as Armed Private Security.

Problem Statement

The WSCJTC experienced a critical safety issue with a Sig Sauer P320 during Fall 2024 BLEA training. There is an abundance of information, not all credible, circulating through the public sphere, regarding safety issues with the Sig Sauer P320. It is imperative that this report reflect the best intentions and objective efforts to discern between fact and fiction. Providing a comprehensive overview of the event, in contrast to some of the publicly available information, will be the basis for the Workgroup discussions and essential insights to assist Executive Director Alexander reach the most logical resolution.

Terminology & Definitions

For the purposes of this report, the terms **unintentional discharge** and **un-commanded discharge** are as follows:

- An **unintentional discharge/negligent discharge/accidental discharge** occurs when a firearm is discharged accidentally, typically due to unsafe handling or failure to follow proper safety measures and protocols. It involves the firing of a gun without the shooter intending for it to happen, often resulting from a failure to maintain control, poor judgment, or unsafe handling practices. While the terms are sometimes used interchangeably, each implies a failure to follow fundamental firearms safety rules, resulting in the actuation of the trigger.
- An **un-commanded discharge** refers to the unintended firing of a firearm **without** the explicit actuation of the trigger.

Workgroup Members & Dates of Participation

- Bellevue Police Dept., Officer Anthony Felder; Oct. 28, 2024 and Nov. 13, 2024
- Kirkland Police Dept., Lt. Troy Knafla; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Kitsap County Sheriff's Office, Sgt. Stan Langlow; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Lacey Police Dept., Sgt. Jeremy Knight; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Marysville Police Dept., Off. Derek Oates; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Marysville Police Dept., Chief of Police and WSCJTC Commissioner Eric Scairpon; Nov. 13, 2024
- Pierce County Sheriff's Dept., Deputy Lincoln Hales; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Proforce Rep. – Company that supplies equipment to law enforcement, military, and other first responders, Mike Russell; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Renton Police Dept., Sergeant Quinton Tibeau; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Setracon Inc. - Enterprise Security Risk Mgmt. Svcs., Jeff Slotnick; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Sig Sauer Representative, Eric Finkelman; November 13, 2024
- Sig Sauer Representative, Jason Bledsoe; November 13, 2024
- Sig Sauer Representative, Keith Gibson; November 13, 2024
- Sig Sauer Representative, Louis Graziano; November 13, 2024
- Sig Sauer Representative, Thomas Mechling; November 13, 2024
- Spokane Police Dept./WSCJTC NE Corp. Cory Lyons; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Spokane Police Dept./WSCJTC NE Lt. Jake Jensen; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WA State Parks & Rec., Asst. Chief Ryan Green; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Applied Skills Training Div. Mgr., Chris Travis; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Conf. Secretary Sacheie Coaxum (Recorder); Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Firearms Program Manager, Henry Gill; October 21, 2024 and October 28, 2024
- WSCJTC Firearms Instructor HQ's, Jarad Howard; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Firearms Instructor Jason Brunner; Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Firearms Instructor, Kyle Cline; November 25, 2024
- WSCJTC Firearms Instructor, Steve Mathisen; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Regional Staff, Michael Russey; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Regional Commander, Paul Bakala; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Regional Staff, Lt. Tim Morgan; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Risk Manager, Marisa Peer; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- WSCJTC Train. Bureau Asst. Cmndr., Dave Miller, Oct. 21, 2024, Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024
- Yakima Police Dept., Rangemaster Ed Levesque; Oct. 28, 2024, Nov. 13, 2024, and Nov. 25, 2024

Event Summary

On October 9, 2024, BLEA class #901 was participating in a firearms shooting drill at the Northeast Regional Academy located at the Spokane Police Department's shooting range. As the Recruit drew their firearm (Sig Sauer P320) to engage the course of fire, their gun immediately self-discharged, more commonly or accurately referred to as an **un-commanded discharge**. The bullet from the Recruit's Sig Sauer P320 struck behind the firearms shooting drill group in the concrete ground. Bullet fragments struck an instructor and another recruit in their lower extremities as they were standing behind the Recruit. All firing was ceased to check for injuries and determine the cause of the discharge. The Recruit reported that as they drew their gun, "I was indexed and the back plate of the slide on my Sig P320 bumped into my vest, self-discharging" which was supported by the firearms instructor who was standing behind the Recruit. The firearms instructor's summary states, that they observed the Recruit during the course of fire, and upon the command to fire, the Recruit's "weapon immediately fired while he was drawing the weapon." The firearms instructor also stated they, "immediately looked at the Recruit's trigger finger and it was not on the trigger or in the trigger guard." The firearms range staff inspected both the Recruit's gun and holster, and then directed the Recruit to conduct several additional draws of their gun to include firing. Although no additional issues were detected, the Recruit was prohibited from using their Sig Sauer P320 in firearms training.

Process Summary

On October 17, 2024, the WSCJTC distributed a statewide notice to stakeholders. The notice summarized the shooting incident which occurred at the WSCJTC's Northeast Regional Academy and declared the use and carrying of the Sig Sauer P320 would be temporarily prohibited on all owned and leased properties to the WSCJTC. This action was taken out of an abundance of caution for staff, instructors, and recruits. Immediately following the stakeholder notification, the WSCJTC assembled a Workgroup to research the numerous online safety accounts (locally and nationally), as well as litigation and civil judgments associated with the Sig Sauer P320s alleged **unintentional discharge** and **un-commanded discharge** events.

- *Confirmed similarities to the Sig Sauer P320, resulted in the Sig Sauer M17 and M18 to also be prohibited*

Workgroup Content Summary and Considerations

On October 21, 2024, the WSCJTC hosted the first of four virtual Workgroup discussions. The Workgroup members consisted of interested stakeholders, representatives from the firearms sales and distribution industry, and WSCJTC staff. In addition to discussions involving Workgroup members, representatives from Sig Sauer requested and were granted an opportunity to present to the Workgroup during the November 13, 2024, virtual meeting. During the meeting, Sig Sauer representatives presented the Workgroup with their power point presentation [SIG SAUER P320 Workgroup Presentation Recording](#) (see **Appendix A**), responded to questions, confirmed similarities of their M17 & M18 ([P320-M17](#) and [P320-M18](#)) (see **Appendix A**) platforms, and agreed to provide all content and documents shared during the presentation. The following topics were addressed or explained by the Sig Sauer representatives:

- Sig Sauer \$2.3 million lawsuit/judgment
 - **Link:** [SIG SAUER \\$2.3 million Lawsuit](#) (see **Appendix B**)
- Montville Police Department
 - **Link:** [Montville PD Incident Firing in Holster 24 July 2023](#) (see **Appendix C**)
- Milwaukee Police Department
 - **Link:** [Video shows unintended shooting injuring Milwaukee officer](#) (see **Appendix D**)
- Connersville Indiana Police Chief involuntary/accidental discharge due to foreign object
- Deployment history of Sig Sauer P320
- Drop Safe upgrade 2017
 - Chart depicting parts upgrade comparison chart
- 5-Step process to fire P320
- Factors involved in involuntary discharge claims
 - Foreign object contact trigger, where the foreign object is no longer present following discharge
 - Jarring/bumping firearm
 - Holster with wide apertures that don't fully protect the trigger area
 - Wrong/modified/damaged holster
 - Unnecessarily handling equipment
 - Lack of familiarity with the fire mechanism or safety components in a particular firearm
 - Transporting firearm in an unconventional manner
- 17-legal cases spanning 2022-2024
 - 1-judgment for the plaintiff (Sig Sauer to appeal)
- The Sig Sauer P320 (and variants, the Sig Sauer M17 and M18)
 - The Sig Sauer P320 is a modular, striker-fired, semi-automatic pistol developed by Sig Sauer, which has been adopted within the law enforcement sector since its introduction in 2014.
 - **Note:** The Sig Sauer M17 and M18 are variants of the P320. The P320 platform is a Modular Handgun System (MHS) that provides for component interchangeability.
- Sig Sauer. (n.d.). *P320 M17* [Webpage]. Sig Sauer. [P320-M17](#) (see **Appendix A**)
- Sig Sauer. (n.d.). *P320 M18* [Webpage]. Sig Sauer. [P320-M18](#) (see **Appendix A**)

The Sig Sauer representatives provided the following summary conclusion:

- The Sig Sauer P320 can ONLY fire if the trigger has been depressed (5 independent actions).
- No Sig Sauer P320 pistol ever discharged during the Sig Sauer drop testing.
- No Sig Sauer P320 pistol revealed any evidence of the Fire Control Unit (FCU) parts slippage, primer deformation, or discharge during independent laboratory testing.
- For an “involuntary discharge” to occur, three separate safety components must all fail simultaneously.
 - Primary Striker/Sear Connection
 - Secondary Sear Notch
 - Safety lock

Workgroup Summary

As introduced at the onset, the Workgroup comprised of firearms industry suppliers, WSCJTC staff and law enforcement personnel from around Washington State. There is no indication that the members from stakeholder agencies were authorized to speak on behalf of their respective agency beyond an offering of their professional opinion. The opinions opposing the prohibition to the Sig Sauer P320, M17 and M18 will be delineated as CON (against) and those in support of the prohibition will be listed as PRO (for).

CON

There was a clear theme offered by the Workgroup members against the temporary prohibition. The presentation by Sig Sauer’s representative was clear and convincing that the P320, M17, and M18 cannot fire without the trigger being pulled and the WSCJTC can provide no evidence to the contrary. Others supporting this argument suggested that using the lower legal standard of preponderance of evidence is not sufficient to prohibit the P320, M17, and M18. These members passionately argued this is not a legal argument even for a lower standard like preponderance of evidence.

Other Workgroup members concluded the WSCJTC un-commanded discharge as a mistake of the BLEA Recruit; equipment management, safety protocols, human body mechanics or other obstructions affecting the draw. In addition, they suggested that perhaps the firearms instructor needed additional training. Although not widely supported, a Workgroup member opined that the online videos are propaganda created by George Soros. Even though the members against the prohibition offered no evidence or contrary information, they passionately argued against any video depictions, news articles, civil judgments and personal testimonials from military or law enforcement personnel.

PRO

The Workgroup members in support of the temporary prohibition offered several local examples of stakeholder agencies who have discontinued authorization to carry the Sig Sauer P320, due to concerns for the un-commanded discharge. Agencies listed were: Vancouver Police Department, Clark County Sheriff's Office, and Pierce County Sheriff. A training incident which occurred during a February 2024 Park Ranger Law Enforcement Academy (PRLEA) was discussed. A Recruit was re-holstering their Sig Sauer P320, and reportedly "properly indexed" when the pistol discharged into the concrete floor of their indoor firing range.

Additionally, six military installation un-commanded discharges involving Sig Sauer P320, M17, and M18 platforms have occurred since 2021. The most significant event was documented at an Okinawa military base because of their impeccable maintenance and training records. In addition, the clear and convincing video capturing the event (only mentioned in final report) which absolved the security guard of negligence.

Included in support of the temporary prohibition is the Department of Defense (DoD) Fiscal Year 17 annual report, which outlines the results of their drop testing of the M17 and M18 variant pistols, for the Army Modular Handgun System (MHS) production award to Sig Sauer. In summary, their testing revealed "the striker struck the primer causing a discharge." Sig Sauer implemented an engineering change proposal to correct this deficiency by implementing lightweight components in the trigger group mechanism. According to the report, this fix "may have contributed to the splintering of two triggers." This report goes on to identify other solutions to the problem believed to be caused by the remedy for the drop testing discharges. This re-engineering of the trigger and lighter sear and striker is the last known public acknowledgment by Sig Sauer to customers (2017) of this program which was prompted by the DoD report.

Critical Findings

The amount of information available on the Sig Sauer P320 is abundant, which creates challenges to reach consensus *for* or *against* a prohibition. In the final analysis, the report eliminated videos and articles from private content creators since the Workgroup could not establish the veracity of the content. The report and its appendices include content and footage members could reasonably validate (police body worn cameras video, surveillance video, police and military investigative reports, traditional news publications and television outlets, civil court filings and judgments, and content from firearm manufacturer, Sig Sauer).

The decision of the WSCJTC to temporarily prohibit the use of the Sig Sauer P320, M17, or M18 was done out of an abundance of caution for the safety of our recruits and staff. We empathize with our stakeholders over the financial impacts to their agencies, and impact to BLEA recruits. For these reasons and more, the Workgroup was created to include a diverse group of individuals to share their experience and to foster dialogue and solicit information from opposing viewpoints for the Executive Director to take into consideration. Despite the argument that an un-commanded discharge is impossible, there remains an abundance of allegations of un-commanded discharges occurring around the country and world attributed nearly exclusively to the Sig Sauer P320, M17, and M18 platforms. The WSCJTC's only concern in this process is preserving the safe learning and working environment for its recruits and instructors. It is not the obligation or objective of the WSCJTC Executive Director to dispel or prove any causation, but rather to review the information collected and make the best decision for the safety and welfare of each individual passing through the owned or leased properties of the Washington State Criminal Justice Training Commission.

Appendix A

- [SIG SAUER P320 Workgroup Presentation Recording](#)
- [P320-M17](#)
- [P320-M18](#)

Appendix B

- [SIG SAUER \\$2.3 million Lawsuit](#)

Appendix C

- [Montville PD Incident Firing in Holster 24 July 2023](#)

Appendix D

- [Video shows unintended shooting injuring Milwaukee officer](#)

Additional Links for Reference

- [Memorandums, Statements regarding Northeast Regional Academy Alleged Un-Commanded Discharge](#)
- [Sig Sauer guns used by military may be firing without trigger pull: NPR](#)
- [Communication from Asst Chief Ryan Green WA State Parks to Henry Gill](#)
- [Washington State Parks Injury Report October 9 2024](#)
- [Stakeholder Notice Sig Sauer P320 Handgun](#)
- [DoD FY 17 Annual Report \(XM17/XM18 Modular Handgun System \(MHS\)\)](#)
- [Breaking: P320 Recall issued Dallas police prohibited duty till repaired](#)
- [SIG SAUER Voluntary Upgrade Notice](#)
- [SIG Voluntary Upgrade Program Media Release](#)
- [Pierce County Sheriff's Department Training Unit Research Notes](#)
- [Memo sent to Pierce County Sheriff's Department Deputies carrying P320 April 27 2023](#)
- [Sig P320 PCSD Training Unit Recommendation](#)
- [Okinawa Incident 14 FEB 2023](#)
- [Ft. Eustis Incident 08 Feb 2023](#)
- [California Incident 30 April 2023](#)
- [Leesville Louisiana Incident 15 Sep 2020](#)
- [Ft. Belvoir Virginia Incident 04 Feb 2022](#)
- [Ft. Leonard Wood Incident 02 Aug 2021](#)
- [SIG SAUER \\$2.3 Million Lawsuit](#)
- [Jarad Howard P320 Workgroup Report](#)
- [VPD P320 Trigger Issues History](#)
- [SIG P320 Handgun Transition Update](#)
- [Officer Warner Memo](#)
- [Officer Hill Memo](#)
- [SIG SAUER Response October 18 2024](#)